

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

<b>IN RE:</b>	<b>Case No. 24-30167</b>
<b>Pro-Mark Services, Inc.,</b>	<b>Chapter 7</b>
<b>Debtor.</b>	<b>Chief Judge Shon Hastings</b>
<b>Erik A. Ahlgren, Trustee,</b>	
<b>Plaintiff,</b>	
<b>-v-</b>	<b>Adv. Case No. 24-07014</b>
<b>Connie Berg, et al.,</b>	
<b>Defendants.</b>	
<b>STIPULATED MOTION TO EXTEND MIGUEL PAREDES' TIME TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT</b>	

1. Plaintiff, Erik A. Ahlgren, as Chapter 7 Trustee of the Bankruptcy Estate of Pro-Mark Services, Inc., as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust, filed this Adversary Proceeding against the Defendants, including Defendant Miguel Paredes on August 26, 2024. (Doc. 1.) Plaintiff filed an Amended Complaint on September 25, 2024. (Doc. 11.)

2. Defendant Paredes filed a Motion to Dismiss on October 25, 2024. (Doc. 30.) The Court entered an Order Denying in Part and Granting in Part Defendant Paredes' Motion to Dismiss on April 4, 2025. (Doc 103.)

3. Defendant Paredes' current deadline to respond to the Amended Complaint is therefore April 18, 2025. Fed. R. Civ. P. 12(a)(4)(A).

4. Plaintiff informed the Court during oral argument, and to address the Court's decisions on several pending motions to dismiss, that he intends to file a second amended complaint in the near future, taking into account several aspects of the Court's rulings on the motions to dismiss.

5. Plaintiff and Defendant Paredes now move the Court, by stipulation, for an order excusing Paredes from responding to the Amended Complaint by the current deadline of April 18, 2025 and providing Defendant Paredes up to thirty days after the date that Plaintiff files a second amended complaint to respond to it.

Dated:

/s/ Peter D. Kieselbach

Michael Fisco (*pro hac vice*)  
Peter D. Kieselbach (*pro hac vice*)  
GREENBURG TRAURIG, LLP  
90 South Seventh St., Suite 3500  
Minneapolis, MN 55402  
(612) 259-9710  
fiscom@gtlaw.com  
kieselbachp@gtlaw.com

*Attorneys for Plaintiff*

Dated:

/s/ Michael L. Scheier

Michael L. Scheier (*pro hac vice*)  
Jacob D. Rhode (*pro hac vice*)  
Samuel B. Weaver (*pro hac vice*)  
KEATING MUETHING & KLEKAMP PLL  
One East Fourth Street, Suite 1400  
Cincinnati, OH 45202  
(513) 579-6952  
mscheier@kmlaw.com

*and*

Michael L. Gust (ND #06468)  
ABST LAW, P.C.  
4132 30<sup>th</sup> Avenue SW, Suite 100  
P.O. Box 10247  
Fargo, ND 58106-0247  
(701) 235-3300  
mgust@abstlaw.net

*Attorneys for Defendant Miguel Paredes*